

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HANGZHOU CHIC INTELLIGENT
TECHNOLOGY CO. and UNICORN
GLOBAL, INC.,

Plaintiffs,

V.

CHEAPAANZEE, et al.,

Defendants.

Case No. 1:20-cv-04806

FILED UNDER SEAL

**DECLARATION OF ARTHUR TAN-CHI YUAN IN SUPPORT OF
PLAINTIFFS' *EX PARTE* MOTION FOR ENTRY OF A
TEMPORARY RESTRAINING ORDER**

I, Arthur Tan-Chi Yuan, on behalf of Hangzhou Chic Intelligent Technology Co. and Unicorn Global, Inc. (“Plaintiffs”), submit this Declaration in support of Plaintiffs’ *Ex Parte* Motion for Entry of a Temporary Restraining Order, and declare as follows:

1. I am senior counsel at Loeb & Loeb LLP and am admitted to practice in this District and Illinois. I have personally reviewed all of the materials provided in the attached Exhibits.

2. On or about August 13, 2020, one unit of the Infringing Products was sold in Chicago, Illinois by Defendant PHILADELPHIABESTDEALS on eBay. True and correct copies of the confirmation email showing purchase order is attached as Exhibit 1.

3. On or about August 13, 2020, one unit of the Infringing Products was sold in Chicago, Illinois by Defendant PURER on Amazon.com. True and correct copies of the confirmation email showing purchase order is attached as Exhibit 2.

4. On or about August 13, 2020, one unit of the Infringing Products was sold in Chicago, Illinois by Defendant CHO INTERNATIONAL INC on Walmart.com. True and correct copies of the confirmation email showing purchase order is attached as Exhibit 3.

5. Attached as Exhibit 4 is a true and correct copy of the unpublished decision cited in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Entry of a Temporary Restraining Order.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 18, 2020

Respectfully submitted,

By: /s/Arthur Tan-Chi Yuan
Arthur T. Yuan, Esq.